

From: [Chapman, Apple](#)
To: [Sullivan, Tim](#); [Williams, Christopher](#)
Cc: [Li, Angelica](#)
Subject: FW: EPA's New Owner Audit Program
Date: Tuesday, June 05, 2018 1:28:34 PM

Ms. Apple Chapman | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) | 202-841-6076 (mobile) |

From: Matthew Todd [mailto:ToddM@api.org]
Sent: Tuesday, June 05, 2018 1:24 PM
To: Chapman, Apple <Chapman.Apple@epa.gov>
Subject: EPA's New Owner Audit Program

Dear Deputy Director Chapman:

This email is intended to communicate API's plan to engage and provide comment in response to the U.S. Environmental Protection Agency's proposed development of a "New Owner Clean Air Act Audit Program" for new owners of oil and natural gas exploration and production facilities and, specifically, the Agency's Draft Standard Audit Policy Agreement. The safe and responsible development of our nation's natural gas and oil resources is of utmost importance for API member companies and the new audit policy could provide our members with a unique opportunity to continue this responsible development as they seek to confirm regulatory compliance following acquisition of new assets. For a new owner audit program to be successful it will need to provide flexibility that reflects our industry's unique and variable operations from basin to basin, allow adequate time to implement any corrective action that may be warranted, and provide clear requirements and fair assurances for any company as they implement any operational or equipment changes that may be needed.

We appreciate the opportunity to provide constructive feedback and plan to attend the June 28th industry stakeholder meeting. In advance of that meeting, API will provide a list of questions on June 21st, based on the draft agreement, to seek a better understanding at the meeting. We are pleased to know that EPA has extended the comment deadline following the June 28th meeting date but the current July 2nd deadline is very short. API will submit written comments to meet the agency's deadline but suggest the agency consider extending it to allow sufficient time following the June 28 meeting.

Thank you for allowing us an opportunity to engage and provide feedback as you develop this new program. After learning more about this program, API will be in a better position to provide substantive comments on the program and specific elements in the draft agreement. If you have questions or wish to discuss further, please feel free to contact me at toddm@api.org or 202.682.8319.

Kind regards,

Matt

Matthew Todd

API

202.682.8319